

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address  GREGORY M. SALVATO (SBN 126285) GSalvato@salvatolawoffices.com JOSEPH BOUFADEL (SBN 267312) JBoufadel@salvatolawoffices.com EMMA SAMYAN (SBN 322703) ESamyan@salvatolawoffices.com SALVATO LAW OFFICES 777 South Figueroa Street, Suite 2800 Los Angeles, California 90071-9500 Telephone: (213) 484-8400  <input type="checkbox"/> Individual <i>appearing without an attorney</i> <input checked="" type="checkbox"/> Attorney for: AZAD BABAN	FOR COURT USE ONLY
<b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b>	
In re: SCOOBEEZ et al,  Debtor.	CASE NO.: 2:19-bk-14989-WB CHAPTER: 11
Affects: <input checked="" type="checkbox"/> All Debtors <input type="checkbox"/> Scoobeez, ONLY <input type="checkbox"/> Scoobeez Global, Inc., ONLY <input type="checkbox"/> Scoobur LLC, ONLY	<b>NOTICE OF LODGMENT OF ORDER IN BANKRUPTCY CASE RE: (title of motion<sup>1</sup>): Stipulation for Entry of Order Granting Relief from Automatic Stay Under 11 U.S.C. § 362(a) (ACTION IN NONBANKRUPTCY FORUM)</b>

PLEASE TAKE NOTE that the order titled Order Granting Motion for Relief from the Automatic Stay Under 11 U.S.C. § 362 (Action in Nonbankruptcy Forum)

was lodged on (date) 10/04/2019 and is attached. This order relates to the motion which is docket number 351.

<sup>1</sup> Please abbreviate if title cannot fit into text field.

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

**Salvato Law Offices, 777 South Figueroa Street, Suite 2800, Los Angeles, CA 90017**

A true and correct copy of the foregoing document entitled (*specify*): **Notice of Lodgment of Order Granting Motion for Relief from the Automatic Stay Under 11 U.S.C. § 362** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **10/04/19**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Richard W Esterkin** richard.esterkin@morganlewis.com
- **John-Patrick M Fritz** jpf@lnbyb.com, JPF.LNBYYB@ecf.inforuptcy.com
- **Riebert Sterling Henderson** shenderson@gibbsgiden.com
- **Vivian Ho** BKClaimConfirmation@ftb.ca.gov
- **Alvin Mar** alvin.mar@usdoj.gov
- **Ashley M McDow** amcdow@foley.com, sgaeta@foley.com;mhebbeln@foley.com;swilson@foley.com;jsimon@foley.com
- **Stacey A Miller** smiller@tharpe-howell.com
- **Kevin H Morse** kmorse@clarkhill.com, blambert@clarkhill.com
- **Shane J Moses** smoses@foley.com
- **Akop J Nalbandyan** jnalbandyan@LNtriallawyers.com, cbautista@LNtriallawyers.com
- **Rejoy Nalkara** rejoy.nalkara@americaninfosource.com
- **Anthony J Napolitano** anapolitano@buchalter.com, IFS\_filing@buchalter.com;salarcon@buchalter.com
- **David L. Neale** dln@lnbyb.com
- **Aram Ordubegian** ordubegian.aram@arentfox.com
- **Hamid R Rafatjoo** hrafatjoo@raineslaw.com, bclark@raineslaw.com;cwilliams@raineslaw.com
- **Gregory M Salvato** gsalvato@salvatolawoffices.com, calendar@salvatolawoffices.com;jboufadel@salvatolawoffices.com;gsalvato@ecf.inforuptcy.com
- **Jeffrey S Shinbrot** jeffrey@shinbrotfirm.com, sandra@shinbrotfirm.com
- **Steven M Spector** sspector@buchalter.com, IFS\_efiling@buchalter.com;salarcon@buchalter.com
- **United States Trustee (LA)** ustpregion16.la.ecf@usdoj.gov
- **Eric K Yaeckel** yaeckel@sullivanlawgroupapc.com

☐ Service information continued on attached page

### **2. SERVED BY UNITED STATES MAIL:**

On (*date*) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **10/04/19**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

---

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

Overnight Mail  
Honorable Julia W. Brand  
United States Bankruptcy Court  
255 E. Temple Street, Suite 1382  
Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

10/04/2019  
*Date*

Tim Mayse  
*Printed Name*

/s/ Tim Mayse  
*Signature*

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address  GREGORY M. SALVATO (SBN 126285) GSalvato@salvatolawoffices.com JOSEPH BOUFADEL (SBN 267312) JBoufadel@salvatolawoffices.com EMMA SAMYAN (SBN 322703) ESamyan@salvatolawoffices.com SALVATO LAW OFFICES 777 South Figueroa Street, Suite 2800 Los Angeles, California 90071-9500 Telephone: (213) 484-8400 Facsimile: (213) 401-2411  <input type="checkbox"/> <i>Movant appearing without an attorney</i> <input checked="" type="checkbox"/> <i>Attorney for Movant</i> AZAD BABAN	FOR COURT USE ONLY
<b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b>	
In re:  SCOOBEEZ et al,  <div style="text-align: right;">Debtor.</div>  Affects: <input checked="" type="checkbox"/> All Debtors <input type="checkbox"/> Scoobeez, ONLY <input type="checkbox"/> Scoobeez Global, Inc., ONLY <input type="checkbox"/> Scoobur LLC, ONLY	CASE NO.: 2:19-bk-14989-WB CHAPTER: 11  <div style="text-align: center; border: 1px solid black; padding: 5px;"> <b>ORDER GRANTING MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. § 362 (Action in Nonbankruptcy Forum)</b> </div> DATE: October 8, 2019 TIME: 10:00 a.m. COURTROOM: 1375 PLACE: Roybal Federal Building 255 E. Temple Street Los Angeles, CA 90012
<b>MOVANT: AZAD BABAN</b>	

1. The Motion was:    ☐ Opposed    ☐ Unopposed    ☒ Settled by stipulation

2. The Motion affects the following Nonbankruptcy Action:

Name of Nonbankruptcy Action: *Azad Baban v. Scoobeez, Inc., et al.*

Docket number: BC692250

Nonbankruptcy court or agency where the Nonbankruptcy Action is pending: Los Angeles Superior Court

3. The Motion is granted under 11 U.S.C. § 362(d)(1).
4. As to Movant, its successors, transferees and assigns, the stay of 11 U.S.C. § 362(a) is:
- ☒ Terminated as to the Debtor and the Debtor's bankruptcy estate.
  - ☐ Modified or conditioned as set forth in Exhibit \_\_\_\_\_ to the Motion.
  - ☐ Annulled retroactively to the bankruptcy petition date. Any postpetition acts taken by Movant to enforce its remedies regarding the nonbankruptcy action do not constitute a violation of the stay.
5. **Limitations on Enforcement of Judgment:** Movant may proceed in the nonbankruptcy forum to final judgment (including any appeals) in accordance with applicable nonbankruptcy law. Movant is permitted to enforce its final judgment only by *(specify all that apply)*:
- ☒ Collecting upon any available insurance in accordance with applicable nonbankruptcy law.
  - ☐ Proceeding against the Debtor as to property or earnings that are not property of this bankruptcy estate.
6. This order is binding and effective despite any conversion of this bankruptcy case to a case under any other chapter of the Bankruptcy Code.
7. ☐ The co-debtor stay of 11 U.S.C. § 1201(a) or § 1301(a) is terminated, modified or annulled as to the co-debtor, on the same terms and conditions as to the Debtor.
8. ☒ The 14-day stay prescribed by FRBP 4001(a)(3) is waived.
9. ☒ This order is binding and effective in any bankruptcy case commenced by or against the Debtor for a period of 180 days, so that no further automatic stay shall arise in that case as to the nonbankruptcy action.
10. ☐ This order is binding and effective in any future bankruptcy case, no matter who the debtor may be, without further notice.
11. ☒ Other *(specify)*:
- Relief from the automatic stay under U.S.C. § 362 is granted for the limited purpose of pursuing the state court action, entitled *Azad Baban v. Scoobeez, Inc., et al.*, Case No. BC692250 (the "**State Court Action**"), to judgment (including through appeal, if and as necessary) in order to liquidate the claims at issue in the State Court Action and solely to recover from and to the extent of any applicable coverage available under the Policies, if any.
  - Plaintiff shall retain the right to prosecute the proof of claim in the Bankruptcy Case, designated as Claim No. 5 ("**Proof of Claim**") to the extent the liability thereunder is not otherwise satisfied by the proceeds of the Policies, if any.
  - Within ten (10) days of Plaintiff's receipt of any proceeds from one or more of the Policies on account of the claims pled in the FAC (the "**Insurance Proceeds**"), Plaintiff shall amend the Proof of Claim to reflect the proceeds received.
  - Within ten (10) days of entry of any judgment in the State Court Action in favor of Plaintiff against the Debtor, Plaintiff shall amend the Proof of Claim to reflect the liquidated amount of the claim(s) as against the Debtors, or any of them, net of any Insurance Proceeds received from the Policies, if any.

###